BRYAN CAVE

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February 4, 2016

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FILED BY ECF

Hon. Ronnie Abrams United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, New York 10007

Re: Bracken v. MI-I Pillars Inc. d/b/a Payza, Obopay Inc. d/b/a Obopay and Ultralight FS, Inc. a/k/a Obopay Inc., 15-CB-7302 (RA)

Dear Judge Abrams:

Bryan Cave represents defendants Obopay Inc. and Ultralight FS, Inc. ("Defendants") in the action referenced above. This letter is being submitted, pursuant to Rule 1(d) of Your Honor's Individual Practices, to request a stay of discovery and to adjourn the pre-trial conference scheduled for February 11, 2016.

Earlier today, Defendants filed a motion to dismiss pursuant to Fed.R.Civ.P. 12(b)(1) and (2) for lack of subject matter and personal jurisdiction. Accordingly, Defendants respectfully request that this court stay discovery and the pre-trial conference, currently scheduled for February 11, 2016, until the Court determines whether it has jurisdiction over Defendants.

This is Obopay's and Ultralight's first request for a stay of discovery and to adjourn a conference. Plaintiff's counsel, Joseph Russell, Esq., does not object to Defendants' request.

Thank you for your consideration.

Respectfully Submitted,

/s/ Mary Beth Buchanan

Mary Beth Buchanan

cc: All counsel of record (via ECF)

Application granted. The initial pre-trial conference and discovery shall both be stayed pending resolution of Defendants' motion to dismiss. So ordered.

Ronnie Abrams, U.S.D.J.

February 4, 2016